



## Client Information pursuant to FinSA in the context of the provision of financial services limited to the acquisition and disposal of financial instruments

On June 15, 2018, the Swiss parliament adopted the Federal Act on Financial Services ("FinSA"). Following the publication of the Financial Services Ordinance ("FinSO") on November 6, 2019, FinSA and FinSO entered into force on January 1, 2020. The Act seeks to protect the clients of financial service providers and as such establishes, in accordance with international standards, requirements for honesty, diligence and transparency in the provision of financial services and governs the offering of financial instruments.

We are providing you this communication as a 'financial service provider' to meet certain requirements imposed on us by FinSA/FinSO. **This communication does not require you to take any specific action but please read it carefully as it contains important information, including the client classification category that we have placed you in.**

### 1 Financial Service Provider

Baillie Gifford Investment Management (Europe) Limited provides investment management and advisory services to European (excluding UK but including Switzerland) clients. It was incorporated in Ireland in May 2018 and is authorised by the Central Bank of Ireland as a MiFID firm. Baillie Gifford Investment Management (Europe) Limited is a wholly owned subsidiary of Baillie Gifford Overseas Limited, which is wholly owned by Baillie Gifford & Co. Baillie Gifford Overseas Limited and Baillie Gifford & Co are authorised and regulated in the UK by the Financial Conduct Authority (together the "Group").

Baillie Gifford Investment Management (Europe) Limited has a representative office in Zurich, Switzerland pursuant to Art. 58 of the Federal Act on Financial Institutions ("FinIA"). It does not constitute a branch and therefore does not have authority to commit Baillie Gifford Investment Management (Europe) Limited. It is the intention to ask for the authorisation by the Swiss Financial Market Supervisory Authority (FINMA) to maintain this representative office of a foreign asset manager of collective assets in Switzerland pursuant to the applicable transitional provisions of FinIA.

Relevant contact address are as follows:

Baillie Gifford Investment Management (Europe) Limited	Head Office: 4/5 School House Lane East, Dublin 2, D02 N279  Representative Office: Bahnhofstr. 10 / Börsenstr. 18 CH - 8001 Zürich
Central Bank of Ireland	New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3

## 2 Financial Service and Financial Instruments

The wider marketing and the promotion of shares or interests in collective investment schemes, in particular the sub-funds of Baillie Gifford Worldwide Funds Plc (together the "Funds"), qualifies as a provision of financial services under Article 3 FinSA - **acquisition and disposal of financial instruments**. Acquisition and disposal of financial instruments is deemed to be an activity addressed directly at specific clients that is specifically aimed at the acquisition or disposal of financial instruments.

The information provided in the context of this financial service is informative only and should not be considered as investment or other advice or a recommendation to buy, sell or hold a particular investment.

For the avoidance of doubt, we will only market and promote shares or interest in collective investment schemes that we manufacture or are manufactured by entities that are part of the Group as described in the previous section (Financial Service Provider).

We do not anticipate accepting compensation from third parties in relation to this financial service. However, in case it arises, we will disclose it to you before accepting such compensation and as required under MiFID II, ensure that the compensation is designed to enhance the quality of the relevant service and does not impair compliance with our duty to act honestly, fairly and professionally in accordance with your best interest. The following are categorised as compensation: brokerage, commission, fees, discounts, kickbacks, trailer fees and other pecuniary benefits.

Details of the risks associated with investment in the Funds can be found in the Key Information Document and Prospectus, copies of which are available at the Literature section of the website. Both Key Information Document and the Prospectus are available in the English language.

## 3 Costs and charges

Detailed information on costs and charges associated with investment in the Funds can be found in the MiFID II – Ex-ante Disclosure, copy of which is available at the Literature section of the website. The MiFID II – Ex-ante Disclosure provides information on the one-time (if any) and ongoing costs of a specific Fund.

## 4 Client Segmentation

Financial service providers shall assign persons for whom they provide financial services to one of the following segments: retail, professional or institutional. A financial service provider may adopt a classification pursuant to foreign law if it determines this classification to be equivalent to the FinSA requirements. We have determined that the MiFID II Client Categorisation regime to be equivalent to the FinSA requirements and as such have categorised you as a professional client.

Although we are obliged to inform you that you are entitled to request a different client categorisation, namely opting in for retail client status, please be aware that we do not maintain the regulatory permissions to accept retail segregated clients.

## 5 Absence of appropriateness and suitability assessment

In the context of the financial service "acquisition and disposal of financial instruments", as described under 1 above, please note that no appropriateness and suitability assessment will be performed from a FinSA perspective.

BGE, as an investment firm, is captured by the MiFID appropriateness assessment requirements when promoting the Funds, in particular the Irish UCITS Fund. BGE will need to ask the client or potential client to provide information regarding its knowledge and experience in the investment field relevant to the specific type of product offered (i.e. UCITS) to assess whether the product is appropriate to the client.

As a professional client, we have assumed that you have the necessary experience and knowledge to understand the risks involved in relation to the Funds. As such, no further information is required from you to complete our assessment.

## 6 Documentation and Rendering of Account

This communication serves as the documentation of the financial services we have agreed to provide you.

Once invested in the Funds, you will be contracted with the Funds and not with BGE (unless you will have a separate fee agreement or enter into a separate discretionary portfolio management agreement). If ongoing client servicing will be provided to you as part of your investment in the Funds, we will be providing you with the relevant information regarding your portfolio through our periodic reporting. Otherwise, you will be receiving relevant information either from the Funds' administrator if directly invested in the Funds or from your intermediary if invested through an omnibus account.

## 7 Difference in the level of protection offered between FinSA and MiFID

Please note that if there is a difference in the level of protection offered to a client between FinSA and MiFID, we will always apply the one that provides a higher level of protection. As a professional client, it is possible for you to release us from applying some of the code of conduct rules set out in FinSA/FinSO. However, as a MiFID firm, we are unable to switch these rules off as they are key aspects of investor protection.

## 8 Affiliation to an Ombudsman's Office

Disputes regarding legal claims between the client and the financial service provider should be settled by an ombudsman in mediation proceedings if possible. Details of Baillie Gifford Investment Management (Europe) Limited's affiliation to an Ombudsman's Office is provided below.

Finanzombudsstelle Schweiz (FINOS)	<p>Head Office: Talstrasse 20 (1<sup>st</sup> Floor) CH-8001 Zürich</p> <p>Email: <a href="mailto:info@finos.ch">info@finos.ch</a> Phone: 0445520800 Website: <a href="http://www.finos.ch">www.finos.ch</a></p>
------------------------------------	--